

UNITED STATES DISTRICT COURT FOR  
THE SOUTHERN DISTRICT OF NEW YORK

CASE NO.: 1:16-mc-00405-LGS

KEITH STANSELL, et al.,

Plaintiff,

vs.

FUERZAS ARMADAS  
REVOLUCIONARIAS DE COLOMBIA,  
a/k/a FARC-EP a/k/a REVOLUTIONARY  
ARMED FORCES OF COLOMBIA, et al.,

Defendants.

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**NOTICE OF MOTION TO UNSEAL BY THIRD-PARTY DEFENDANTS**

PLEASE TAKE NOTICE that pursuant to Rule 5.2(d) of the Federal Rules of Civil Procedure, Section III(F) of this Honorable Court's Individual Practices in Civil Cases, and the United States Constitution, Third-Party Defendants Ministerio del Poder Popular de Economía, Finanzas y Comercio Exterior; Banco de Venezuela S.A., Banco Universal; Banco Bandes Uruguay, S.A.; and Banco Bicentenario del Pueblo, de la Clase Obrera, Mujer y Comunas, Banco Universal C.A, by and through undersigned counsel, hereby move this Court for an order unsealing the following documents:

- (1) Plaintiffs' Motion for Writ of Execution (Doc. No. 119);
- (2) Order Granting Motion for Writ of Execution (Doc. No. 130);
- (3) Plaintiffs' Motion for Writ of Execution (Doc. No. 166); and
- (4) Order Granting Motion for Writ of Execution (Doc. No. 176).

Filed in support of this motion is the accompanying memorandum of law.

Dated: December 8, 2021

Respectfully submitted,

s/Marcos Daniel Jiménez

Marcos Daniel Jiménez

New York Bar No. 4881736

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Clase Obrera, Mujer y Comunas, Banco  
Universal C.A; Petrocedeño, S.A.; Aceites  
y Solventes Venezolanos Vassa, S.A.;  
Venfleet Asphalt, Ltd.; Petro San Felix,  
S.A.; Venezuelan Heavy Industries, C.A.;  
and Petrowarao, S.A.*